

UNITED STATES DISTRICT COURT

for the

District of

Division

FILED
DISTRICT COURT OF GUAM

NOV 19 2018

JEANNE G. QUINATA
CLERK OF COURTWashington D.C. Seattle City
Manufacturing Inc.
Jaydeen Catherine Delacruz

Plaintiff(s)

Case No.

CV-18-00038

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐ Yes☒ No

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Bank of Guam Santa Cruz Branch
Bank Pacific Aspinall Lane Hagatna Branch
Bank of Hawaii 2nd Floor of B.O.H. BLDG. Hagatna Branch
First Hawaiian Bank Maite Branch

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

1st Amendment

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jaydeen Catherine Delacruz
#122 Santa Rosa Avenue
Hyundai Santa Rita
Guam, 96915
671-565-7517/2861
jaydeendelacruz227@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Bank of Guam
Santa Cruz Branch
Richard Bevenhite
(Main Bldg - Headquarters)
Hagatna, Guam
671.472-3300
www.bogsupport.com

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Bank Pacific
Supervisor Hagatna Branch
Mr. Arriola
Hagatna Branch
Aspirilla Lane, Hagatna
671.479-1167
BankPacific.org

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Bank of Hawaii
Manager Michael
Hagatna Branch
Santa Rita Street,
Hagatna, Guam, 96932
1.877.553.2424
Bankofhawaii.org

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

First Hawaiian Bank
Supervisor
400 S Maite Branch
Maite Guam, 96910
Guam
671.475-7900
Firsthawaiian.org

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Discrimination; Fair Labor Standards;
Injunction; civil Rights

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Jaydeen Catherine DelaCruz is a citizen of the
State of (name) Guam.

b. If the plaintiff is a corporation

The plaintiff, (name) Jaydeen Catherine DelaCruz, is incorporated
under the laws of the State of (name) Guam,
and has its principal place of business in the State of (name)
Guam.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Bank of Guam, is a citizen of
the State of (name) Guam. Or is a citizen of
(foreign nation) Saipan, Guam.

b. If the defendant is a corporation

The defendant, (name) Guam, is incorporated under
the laws of the State of (name) Guam, and has its
principal place of business in the State of (name) Guam.
Or is incorporated under the laws of (foreign nation) Saipan, Guam,
and has its principal place of business in (name) Guam.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$980 2illion hundred thousand dollars.
Because defendant is handling business
in a foreign country like Saipan business is
not in Guam.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- off Island business - Senator for Legislature
- Gov. of Guam Authority - Civil Rights
- Injunction - Discrimination - Fair Labor Standards.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

do not touch anything - can't touch anything
to follow courts order and jurisdiction
and maintaining support for political affairs.
\$980 zillion hundred thousand dollars.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: November 19, 2018

Signature of Plaintiff

Printed Name of Plaintiff

Jaydeen C. Delacruz
Jaydeen Catherine Delacruz

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Jaydeen Catherine Dela Cruz
Commission Senator Guam Legislature
P.O. Box 5484 Hagatna Guam, 96932
(671)477-9866 Office (671)477-9867 Fax
Jaydeendelacruz27@gmail.com
Email: if available

JAYDEEN CATHERINE DELACRUZ, IN PRO SE

UNITED STATES DISTRICT COURT OF GUAM

WASHINGTON D.C. SEATTLE CITY
MANUFACTURING INC.
JAYDEEN CATHERINE DELA CRUZ(S)

Plaintiff(s),

vs.

BANK OF GUAM SANTA CRUZ BRANCH
BANK PACIFIC ASPINALL LANE HAGATNA
BRANCH
BANK OF HAWAII HAGATNA BRANCH 2ND
FLOOR OF BOH BLDG.
FIRST HAWAIIAN BANK MAITE
BRANCH(S),

Defendant(s).

Case No.: CIVIL / PETITION/ APPLICATION
FOR DISSOLUTION OF MARRIAGE (NO
FAULT ACTION) (NO CHILDREN)

DOCUMENT TITLE (e.g., NOTICE OF
MOTION AND MOTION FOR STRIKING
PORTIONS OF COMPLAINT)

DATE: (date of hearing)
TIME: (time of hearing)
DEPT: (department number)

Judge: (name of hearing judge)
Dept: (department number)
Action Filed: (date)
Trial Date: (Date or Unassigned)

PETITIONER, JAYDEEN CATHERINE DELACRUZ, resides at #122 Santa Rosa Avenue
Hyundai Santa Rita Guam, 96915/ address/, city of Santa Rita Country of Guam and state of the
United States for 5 years. /specify time period/.

PETITIONER, JAYDEEN CATHERINE DELA CRUZ, Resides at# 8 D Toves Apts. Erskin Drive
New Agat , Guam 96928/address/, city of Agat Country of Guam, state of United States for 11

1 years/specify time period/. PETITIONERS were married on September 23, 1994 in the city of
2 Hagatna Guam, 96932 in the city of Hagatna Country of Guam state of United States.

3
4 One: petitioners separated on September 23, 2009

5 Two: There are no children of this marriage and petitioner Jaydeen Catherine Dela Cruz is not
6 pregnant.

7 Three: petitioners consent to jurisdiction of the court.

8 Four: incompatibility of temperament has caused the irremediable breakdown of petitioner's
9 marriage.

10 Five: petitioners have agreed as to distribution of all jointly owned real and personal property. A
11 copy of such agreement is attached. Hereto, marked Exhibit "A", and by reference made part
12 hereof, so that it may be approved by the court and incorporated in a dissolution of marriage decree.

13 Six: petitioners have agreed as to the payment of all unpaid obligations incurred by them, jointly
14 and individually, and as the payment of all obligations incurred jointly in the future.

15 Seven: The occupation of petitioner is Senator for the Guam Legislature.

16 Eight: A financial statement of the petitioners listing their respective income, assets, and liabilities
17 is attached hereto as Exhibit "A" and incorporated herein by reference.

18 Petitioner request that:

- 19 1. The marriage of the parties be dissolved;
20 2. petitioner Jaydeen Catherine Dela Cruz Salas 's former name be restored to her.

21
22 Signatures, Verification
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25 DATED: November 19, 2018

26 Jaydeen Catherine Dela Cruz
27 YOUR NAME
28 In Pro Se

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Jaydeen Catherine Dela Cruz
Commission Senator Guam Legislature
P.O. Box 5484 Hagatna Guam, 96932
(671)477-9866 Office (671)477-9867 Fax
Jaydeendelacruz27@gmail.com
Email: if available

JAYDEEN CATHERINE DELACRUZ, IN PRO SE

UNITED STATES DISTRICT COURT OF GUAM

WASHINGTON D.C. SEATTLE CITY
MANUFACTURING INC.
JAYDEEN CATHERINE DELA CRUZ(S)

Plaintiff(s),

vs.

Navy Federal Credit Union Naval Base
Community First Federal Credit Union Hagatna
Branch DNA Building 1st Floor
Coast 360 Federal Credit Union maite Branch
Pen Fed Federal Credit Union GCIC Bldg. 1st
Floor(S),

Defendant(s).

) Case No.: CIVIL / PETITION/ APPLICATION
) FOR DISSOLUTION OF MARRIAGE (NO
) FAULT ACTION) (CHILDREN)

) **DOCUMENT TITLE (e.g., NOTICE OF
) MOTION AND MOTION FOR STRIKING
) PORTIONS OF COMPLAINT)**

) **DATE: (date of hearing)**
) **TIME: (time of hearing)**
) **DEPT: (department number)**

) Judge: (name of hearing judge)
) Dept: (department number)
) Action Filed: (date)
) Trial Date: (Date or Unassigned)

This petition is filed by Jaydeen Catherine Dela Cruz Salas /wife or Husband /, who alleges as follows:

PETITIONER, JAYDEEN CATHERINE DELA CRUZ, Resides at# 8 D Toves Apts. Erskin Drive New Agat , Guam 96928/address/, city of Agat Country of Guam, state of United States for 11 years/specify time period/. PETITIONERS were married on September 23, 1994 in the city of Hagatna Guam, 96932 in the city of Hagatna Country of Guam state of United States.

One: Irreconcilable differences have caused the irremediable breakdown of the marriage of Matthew Francis G. Salas, husband and Jaydeen Catherine Dela Cruz Salas wife or The Marriage of Matthew Francis G. Salas, Husband and Jaydeen Catherine Dela Cruz Salas, is irretrievably broken or as the case may be./

Two: The residence of husband is at #122 North Eugenio Street Upper Agat, Guam, 96928/address/city of Agat country of Guam state of United States for the period of 11 years.

Three: the residence of wife is at #217 Duenas Street Upper Agat, Guam 96928/address/ City of Agat country of Guam, and state of United States and wife has been a residence for a period of 11 years.

Four: Wife Jaydeen Catherine Dela Cruz Salas / is pregnant.

Five: Husband and wife were married on September 23, 1994 in the city of Hagatna Guam, 96932 City of Agana Country of Guam, state of United States, and separated on or about September 18, 2009.

Six: The living children of the marriage are as follows:

Jayleena Maria Dela Cruz	17 years old	8D Toves apts. New Agat
Jamika May Dela Cruz	14 years old	8D Toves apts. New Agat
Jaethan Matthew Dela Cruz	11 years old	8D Toves apts. New Agat
Jaxaivier Marico Dela Cruz	3 years old	8D Toves apts. New Agat

Seven: The following arrangements have been made by husband and wife as to the custody and support of the above-named children and maintained of spouse. Jaydeen Catherine Dela Cruz Whereof, petitioner prays for judgment as follows:

1. Dissolution of the marriage of Jaydeen Catherine Dela Cruz and Matthew Francis G. Salas;
2. That the custody of the above-named children be awarded to Jaydeen Catherine Dela Cruz
3. That Matthew Francis G. Salas be required to pay the sum of \$25,000.00 per Month child for support and maintenance of children;
4. The maintenance in the sum of \$25,000.00 per month be grant for the children's support.

1 5. That costs of maintaining this action and attorney fees be awarded to Jaydeen Catherine Dela
2 Cruz; and
3 6. that the court grant such other and further relief as it may deem proper.
4

5 /Signature/ Verification/
6
7

8 TED: November 19, 2018

Jaydeen Catherine Dela Cruz

YOUR NAME

In Pro Se